

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF OKLAHOMA**

IN RE:	)	
MICHELA CRUMP,	)	Case No. 21-12875-SAH
Debtor	)	Chapter 7
	)	
IAN'S ENTERPRISE, LLC	)	
	)	
Plaintiff,	)	
vs.	)	Adv. Pro. 22-1006
	)	
MICHELA CRUMP,	)	
	)	
Defendant.	)	

**REQUEST FOR ENTRY OF DEFAULT BY THE CLERK**

Pursuant to Federal Rule of Civil Procedure 55(a), made applicable to adversary proceedings by Federal Rule of Bankruptcy Procedure 7055, Plaintiff, Ian's Enterprise, LLC ("Plaintiff") respectfully requests Entry of Default by the Clerk against Defendant, Michela Crump ("Defendant") for failure to plead or otherwise defend in this adversary proceeding as required by law. In support of this request, Plaintiff states as follows:

1. Plaintiff filed the *Complaint* against Defendant on January 21, 2022 [Doc. 1]. A *Summons In An Adversary Proceeding* was duly issued to Defendant by the Clerk of the Bankruptcy Court on January 1, 2022 [Doc. 2].
2. As evidenced by the Return of Service filed on April 7, 2022, Defendant was properly served with the *Complaint* and *Summons In An Adversary Proceeding* by serving Defendant via first-class mail to Defendant on January 25, 2022.
3. As evidenced by the Return of Service filed on April 7, 2022, the attorney of record for Defendant in the underlying bankruptcy case, was properly served with a copy of the

*Complaint and Summons In An Adversary Proceeding* via first-class mail to the same on January 25, 2022.

4. The time for Defendant to answer or otherwise respond to the Complaint expired on February 21, 2022.
5. Defendant has not filed an answer or other responsive pleading.
6. Defendant is not a minor or incompetent person.
7. Pursuant to 50 U.S.C.A. App. § 521, after having conducted a reasonable inquiry into the military service status of the Defendant in this matter, the undersigned attorney declares that based on the records kept by the Department of Defense Manpower Data Center, it appears that Defendant is not in military service as defined by the Servicemembers' Civil Relief Act of 2003, 50 U.S.C. §§ 3901-4043 (See attached Military Status Reports).
8. The Affidavit of Amanda R. Blackwood, counsel for Plaintiff, is attached hereto in support of this Request.

Dated this 7<sup>th</sup> day of April, 2022.

Respectfully Submitted,

/s/ Amanda R. Blackwood  
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